

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

In re:

**Matthew Alan Jenkins,
f/d/b/a Shephard Service Company,

Debtor.**

Case Number: 12-50413

Chapter 7

MOTION TO EXTEND THE TIME TO OBJECT TO DISCHARGE

James T. Ward, Sr., the trustee (the “Trustee”) in the above-referenced bankruptcy case, through counsel, and the Bankruptcy Administrator for the Western District of North Carolina (“Bankruptcy Administrator”), respectfully represent as follows:

BACKGROUND

1. The Debtor, Matthew Allen Jenkins (the “Debtor”), filed his *pro se*, voluntary petition (“Petition”) (D.E. 1) for relief pursuant to chapter 7 of the Bankruptcy Code on April 11, 2012 (the “Petition Date”), which case was assigned to the Trustee.

2. James T. Ward, Sr. is the duly appointed, qualified and acting Trustee of the Debtor’s Chapter 7 case.

3. The last day to file a Complaint to object to the Debtor’s discharge pursuant to 11 U.S.C. § 727 is July 13, 2012.

4. The 11 U.S.C. § 341 Meeting of Creditors (“Meeting of Creditors”) was held on May 14, 2012 but was not concluded. The Trustee has attempted to schedule the continued Meeting of Creditors, but the Debtor has not responded to the Trustee’s counsel concerning his availability for the continued Meeting of Creditors.

5. On June 6, 2012, the Trustee filed a Motion for Order Setting Date for

Continued Meeting of Creditors [docket # 78].

6. The Debtor has failed to cooperate with the Trustee and his counsel and has failed to maintain appropriate records.

7. The Trustee and the Bankruptcy Administrator need additional time in which to determine whether to object to the Debtor's discharge and the grounds therefor.

WHEREFORE, the Trustee and the Bankruptcy Administrator pray as follows:

1. That an Order be entered extending the time for the Trustee and the Bankruptcy Administrator to object to the Debtor's discharge for sixty (60) days following the conclusion of the Meeting of Creditors.

2. For such other and further relief as is just and proper.

This is the 18 day of June, 2012.

/s/ A. Cotten Wright

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/s/ Linda W. Simpson

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CERTIFICATE OF SERVICE

The undersigned certifies that the pleading(s) or paper(s) to which this Certificate is affixed was served upon the party(s) to this action listed below by depositing a copy of the same, enclosed in a first-class postpaid, properly addressed wrapper, in a Post Office or official depository under the exclusive care and custody of the United States Postal Service and/or by means of the Electronic Filing System of the Bankruptcy Court on June 18, 2012.

Matthew Alan Jenkins
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/s/ Linda W. Simpson

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